

August 8, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

Re: Permitted Oral *Ex Parte* Presentation
ET Docket Nos. 10-236 and 06-155 and IB Docket No. 05-20

Dear Ms. Dortch:

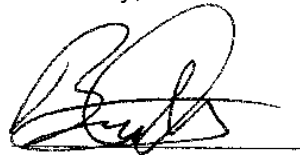
On August 8, 2012, representatives of The Boeing Company ("Boeing") met with Commissioner Ajit Pai and his legal advisor, Courtney Reinhard. Attending the meeting on behalf of Boeing were Audrey Allison, Director, Frequency Management Services; Jennifer McIntyre, Chief Counsel, Government Operations; and the undersigned. The attached talking points were distributed during the meeting.

Although the meeting was primarily introductory in nature, the parties addressed briefly the above-referenced proceedings. With respect to the experimental licensing proceeding, the Boeing representatives advocated the revision of the Commission's experimental licensing rules and procedures to make it easier for companies engaged in research and development to undertake experimental wireless operations. In particular, Boeing discouraged the imposition of burdensome coordination and consent requirements on experimental authorizations that do not pose an appreciable risk of causing harmful interference to other licensees.

The Boeing representatives also discussed the need for the Commission to complete expeditiously its long pending proceeding on the adoption of formal rules for the Aeronautical Mobile-Satellite Service ("AMSS") in the 14.0-14.5 GHz band. Boeing explained that AMSS should properly be designated as a primary application of the Fixed Satellite Service, just as the Commission did in recent years for Earth Stations Onboard Vessels and for Vehicle Mounted Earth Stations.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Olcott', written over a horizontal line.

Bruce A. Olcott
Counsel to The Boeing Company

cc: A. Pai
C. Reinhard

THE BOEING COMPANY

August 2012

- Boeing is the world's largest aerospace company and a leading US exporter with 70% of its commercial aircraft sales overseas, resulting in total revenue of \$68.7 billion in 2011
- Boeing has more than 170,000 employees working in all 50 states and in 70 countries
- Boeing relies on telecommunications and spectrum resources to support its operations
 - Boeing operates an international IP-based telecommunications and data network for internal communications and broadband collaboration
 - Boeing employs 518 active FCC spectrum licenses in its operations, including:
 - 315 wireless licenses for aircraft communications and testing, factory operations, emergency response and security, and microwave data links
 - 27 satellite earth station licenses for data links and satellite management
 - 176 experimental licenses for research, product development, new aircraft testing and certification, and to support government operations

Spectrum Management

- Boeing uses spectrum for critical high value functions (such as verifying aircraft safety) that greatly serve the public interest but cannot be quantified on a MHz/POP basis
- Boeing is a responsible spectrum steward, returning licenses when unneeded and supporting sharing where possible. Boeing was instrumental in the MBANs compromise
- Certain of Boeing's spectrum uses, however, require very low background noise, high reliability, and stringent protection from co-channel and adjacent channel interference

Wireless Experimentation

- Burdensome coordination and consent requirements are increasingly imposed on experimental licenses, greatly delaying, increasing costs, and often preventing tests
- The National Broadband Plan (Recommendation 7.7) advocates "more flexible experimental licensing rules" including permitting experimentation "without individual coordination of frequencies, conditioned on not causing harmful interference"
- Coordination and consent requirements should be imposed only on experimental operations that pose an appreciable risk of causing harmful interference

Broadband Access

- Boeing relies on the Internet to connect employees, customers and a global supply chain
- The open Internet must be preserved, with nondiscriminatory access for all users, which may necessitate reasonable network management practices to ensure its availability

Aeronautical Broadband Communications

- Boeing operates a global broadband satellite service connecting Federal VIP aircraft and Boeing supports the growth of multiple commercial aeronautical broadband services
- The aeronautical mobile satellite service ("AMSS") rulemaking should be completed and AMSS should be designated a primary application of the 14 GHz fixed satellite service